

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Civil No. 19-2875 (RBK/JS)

This Document Relates to:

All Actions

**STIPULATED ORDER REGARDING ESI SEARCH TERMS
PERTAINING TO THE TEVA DEFENDANTS**

THIS MATTER HAVING COME before the Court on the Manufacturer Defendants’ Motion to Modify the ESI Search Terms (Dkt. 445); and

THIS COURT HAVING CONSIDERED the parties’ submissions in support of and in opposition to said Motion, as well as the argument and representations of counsel made during the telephonic status conference on June 17, 2020,


IT IS HEREBY ORDERED as follows:

1) Given that an agreement has been reached between Plaintiffs and the Teva Defendants to resolve these parties’ current dispute concerning ESI search terms as set forth in the pending Motion and related briefing, the Manufacturer Defendants’ Motion to Modify the ESI Search Terms is **DENIED AS MOOT** with respect to Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd. (collectively, the “Teva Defendants”);

2) For purposes of adopting and formalizing the agreement reached between Plaintiffs and the Teva Defendants, the Court **FURTHER ORDERS** as follows:

- a. Exhibit H to the December 23, 2019 Order (Dkt. 328 at 29-57) is hereby revised, supplemented and superseded as to the Teva Defendants per the modifications set forth in Exhibit H-1 to this Stipulated Order;
- b. Plaintiffs and the Teva Defendants will continue good faith discussions regarding potential additional reasonable and proportional adjustments to the search terms as such needs are identified during the search, processing, review and/or production of the custodial documents, and the parties are permitted to apply any additional agreed-to modifications to these search terms without further order of the Court;
- c. The parties will proceed in accordance with the ESI Protocol (Dkt. 125), as well as their representations and the Court's instructions made during the June 17, 2020 status conference, to resolve any future issues regarding the search terms through the meet and confer process that might arise during the processing, review, and production of the Teva Defendants' ESI.

SO ORDERED, this the 24th day of June 2020.



JOEL SCHNEIDER
United States Magistrate Judge